

EXHIBIT A

IN THE SUPERIOR COURT OF LOWNDES COUNTY

STATE OF GEORGIA

CATHERINE TAYLOR,

Plaintiff,

v.

**MURPHY OIL USA, INC.,
 A/K/A MURPHY USA, INC.,
 D/B/A MURPHY EXPRESS,**

Defendant.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION

FILE NO.: 2020CV1562

COMPLAINT

COMES NOW, CATHERINE TAYLOR, Plaintiff in the above-styled action, and files this, her Complaint against Defendant, showing the Court as follows:

1.

MURPHY OIL USA, INC., a/k/a MURPHY USA, INC., d/b/a MURPHY EXPRESS, hereinafter referred to as "Defendant," is a foreign corporation incorporated in the State of Delaware, and is authorized to and does transact business within the State of Georgia.

2.

Defendant owns and operates a store located in Valdosta, Georgia, and is subject to the jurisdiction of this Honorable Court.

3.

Jurisdiction and venue are proper in this Court.

4.

Service of process may be perfected upon Defendant by serving its registered agent, C T Corporation System, 289 S. Culver Street, Lawrenceville, GA 30046-4805.

5.

On or about January 13, 2020, Plaintiff went to Defendant's establishment located at 3300 Inner Perimeter Road in Valdosta, Georgia, as a customer/business invitee.

6.

Plaintiff was walking into the store entrance, and as she stepped, she tripped over a defective mat on the floor. The dangerous condition (i.e. defective/dangerous mat) was not readily apparent to the average customer/business invitee.

7.

Defendant knew or should have known of the dangerous condition before Plaintiff was injured by the display.

8.

Defendant had notice of the dangerous condition.

9.

The Defendant's employees and agents knew of such dangerous condition on January 13, 2020, and notwithstanding their knowledge of such dangerous condition, maintained such dangerous condition on January 13, 2020.

10.

This dangerous condition, which was known to the agents and employees of the Defendant, was unknown to Plaintiff.

11.

As a result of the incident, Plaintiff has suffered serious bodily injury.

12.

As a result of the injuries and negligence of Defendant, Plaintiff has suffered past, present and will in the future suffer pain therefrom.

13.

Plaintiff has incurred medical expenses for treatment of her injuries.

14.

Plaintiff's injuries are permanent and continuing in nature.

15.

All damages suffered by Plaintiff are the direct and proximate result of the Defendant's negligent acts.

WHEREFORE, Plaintiff prays as follows:

- a. That service of process issue in accordance with the law;
- b. That Plaintiff have a jury trial on all issues set forth herein;
- c. That Plaintiff recover a judgment against the Defendant in the amount of \$155,000 for medical bills, and pain and suffering;
- d. That Plaintiff be entitled to reasonable attorney's fees and all costs of this action;
- e. That Plaintiff have such other and further relief as this Honorable Court deems just and proper.

This the 2nd day of November, 2020.

JODY D. PETERMAN, LLC

/s/ Jody D. Peterman

JODY D. PETERMAN

Attorney for Plaintiff

Georgia Bar No.: 573552

P.O. Box 6010

Valdosta, GA 31603-6010

Phone (229) 247-0386

Fax (229) 469-6735

Email: petermanlawoffice@yahoo.com

dhanson.petermanlaw@gmail.com

/s/ Dillon P. Hanson

DILLON P. HANSON

Attorney for Plaintiff

Georgia Bar No.: 883590